

EXHIBIT B

KIRBY AISNER & CURLEY LLP
Co-Counsel for Jared Chassen
700 Post Road, #237
Scarsdale, NY 10583
(914) 401-9501
Dawn Kirby, Esq.
dkirby@kacllp.com

SCHWARTZ LAW PLLC
Co-Counsel for Jared Chassen
150 Broadway, Suite 701
New York, New York 10038
(347) 460-5379
Allen Schwartz, Esq.
allen@allenschwartzlaw.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re:

Chapter 11
(Subchapter V)

JJ ARCH LLC,

Case No. 24-10381 (JPM)

Debtor.

-----X

**DECLARATION OF JARED CHASSEN IN SUPPORT OF MOTION
FOR AN ORDER DISMISSING THE DEBTOR'S BANKRUPTCY CASE**

Jared Chassen hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I submit this declaration in support of my motion seeking an order dismissing the Debtor's bankruptcy case.
2. I am a member of the purported debtor, JJ Arch LLC ("JJ Arch").
3. This bankruptcy was filed by Jeffrey Simpson ("Simpson") without seeking or obtaining my consent, which is required by the JJ Arch LLC Operating Agreement and court orders.

4. To be clear, I do not consent to this bankruptcy filing by Simpson, which he filed based on perjurious statements to this Court that he is the “sole member” of JJ Arch and that I was deemed terminated from JJ Arch in August 2023.

5. In fact, I terminated him in August 2023 for numerous cause events, and as part of his interim restoration as managing member of JJ Arch by the court, I was restored to my member role, with my consent rights in JJ Arch enshrined in court orders during the pendency of the litigation. *See* Schwartz Decl. Ex. 10, Aug. 22, 2023 Order Regarding Interim Operating Procedures. The substantive allegations in the state court proceeding are detailed in the exhibits annexed to the Schwartz Declaration.

6. Under the JJ Arch Operating Agreement, my consent is required for any Major Decision, one of which is a bankruptcy filing. *See* Schwartz Decl. Ex. 7, Amended JJ Arch LLC Operating Agreement (the “Amended JJ Arch Operating Agreement”) at § 3.2(ii) (requiring my consent before any Bankruptcy Action); Schwartz Decl. Ex. 1, JJ Arch LLC Operating Agreement at Definitions, Bankruptcy Action.

7. Moreover, the courts orders, annexed to this Motion, make clear that this bankruptcy filing, and the sworn statements in it to this Court, are in direct disobedience of both the JJ Arch LLC Operating Agreement and multiple court orders.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 14, 2024.

By: /s/ Jared Chassen
Jared Chassen